IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	§	
FIELDWOOD ENERGY LLC, et al.,	§ §	CASE NO. 20-33948
	§	
	§	
DEBTORS ^{1.}	§	

JOINDER AND RESERVATION OF RIGHTS REGARDING BEDROCK PETROLEUM CONSULTANTS, LLC'S RESERVATION OF RIGHTS AND LIMITED OBJECTION TO DIP FINANCING AND CASH COLLATERAL MOTION (RE: DOCKET NO. 22, 192)

Halliburton Energy Services, Inc. ("Halliburton"), creditor and party in interest, files this joinder to the and reservation of rights with respect to the limited objection filed by Bedrock Petroleum Consultants, LLC ("Bedrock") to the *Emergency Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors (A) to Obtain Postpetition Financing Pursuant to 11 U.S.C.* §§ 105, 361, 362, 363(b), 364(c)(1), 364(c)(2), 364(c)(3), 364(d)(1) and 364(e) and (B) to Utilize Cash Collateral Pursuant to 11 U.S.C. § 363, (II) Granting Adequate Protection to Prepetition Secured Parties Pursuant to 11 U.S.C. §§ 361, 362, 363, 364 and 507(b) and (III) Scheduling Final Hearing (Docket No. 22) (the "DIP Motion"), and in support thereof, Halliburton would show to the Court the following.

W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

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¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors' primary mailing address is 2000

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1. As of the Petition Date, Halliburton possesses claims against the Debtors in the

aggregate amount of at least \$6,367,036.18.

2. With respect to such claims, Halliburton has perfected and/or is entitled to perfect

mineral liens and/or other statutory liens against the interests in property of the Debtors.

3. Halliburton joins the limited objection filed by Bedrock Petroleum Consultants,

LLC (Docket No. 192) as if fully set forth verbatim herein to the extent that such objection relates

to the interests of Halliburton. In addition, Halliburton requests that it also be listed in the proposed

language.

4. Based upon the foregoing, Halliburton further reserves the right to object to the

entry of the Final DIP Order, including the inclusion (or absence, as the case may be) of the

additional language proposed by Bedrock.

5. Halliburton reserves the right to raise such further and additional objections, and/or

to join in any other objections relating to the DIP Motion at any time prior to the hearing

considering the DIP Mo on a final basis.

6. Halliburton further reserves all rights with respect to these bankruptcy cases, all

rights under any contracts and operating agreements, all rights related to any notices of assumption

and cure, and all rights with respect to any claim it may assert or has asserted in this case, including,

but not limited to, administrative priority claims that may arise, adequate protection for such

expenditures, and all other rights in this case

WHEREFORE, Halliburton Energy Services, Inc. respectfully requests that the Court

sustain the limited objection. Creditor requests such other and further relief to which the creditor

is entitled at law or in equity.

Dated: August 20, 2020 Respectfully submitted:

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

By: /s/ Jeff Carruth

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ATTORNEYS FOR HALLIBURTON ENERGY

joinder objection final DIP SERVICES, INC.

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing item was served upon all registered ECF users who have appeared in this case to date, including the parties listed below, which includes all persons required to receive notice under the relevant interim order(s).

/s/ Jeff Carruth
JEFF CARRUTH

ECF SERVICE LIST AS OF AUGUST 20, 2020, 4:00 P.M.

<u>A</u>

20-33948 Notice will be electronically mailed to:

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